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May 4, 2021

VIA ECF

MEMORANDUM ENDORSEMENT

Hon. Kevin N. Fox, U.S.M.J. Thurgood Marshall United States Courthouse 40 Foley Square New York. NY 10007

Re: Actava TV, Inc., et al. v. Joint Stock Company "Channel One Russia

Worldwide" et al. (18-cv-06626)

Dear Judge Fox:

We are counsel for Plaintiffs herein. We write pursuant to the Court's Friday April 30, 2021 order (ECF 318) ordering defendant Kartina Digital GmbH ("Kartina") to provide Ms. Panfilova for deposition, and directing us to schedule it expeditiously.

At 3:30 pm on Friday April 30, we emailed counsel for Kartina asking them for dates when Ms. Panfilova will be available to be deposed, and whether she needs a translator. We received no response. This morning, we therefore notified all counsel that we will take the deposition of Kartina by Ms. Panfilova next Tuesday, May 11, 2021 starting at 9 am EST, with a follow up session if necessary on Thursday May 13, also starting at 9 am EST.

We are advising the Court of the date of this Court-ordered deposition as required by its April 30 order.

Respectfully submitted,

/s/ Toby Butterfield

5/5/21

The time for the parties to complete pretrial discovery is enlarged to May 13, 2021, solely for conducting Ms. Panfilova's deposition.

SO ORDERED:

Kevin Grathanul Fox

Kevin Nathaniel Fox, U.S.M.J.